1	ISMAIL J. RAMSEY (CABN 189820)		
2	United States Attorney MICHELLE LO (NYRN 4325163)		
3	Chief, Civil Division ELIZABETH KURLAN (CABN 255869)		
4	Assistant United States Attorney		
5	450 Golden Gate Avenue, Box 36055 San Francisco, California 94102-3495		
6	Telephone: (415) 436-7298 Facsimile: (415) 436-6748		
7	Elizabeth.Kurlan@usdoj.gov		
8	Attorneys for Defendants		
	UNITED STATES DISTRICT COURT		
9	NORTHERN DISTRICT OF CALIFORNIA		
10	SAN FRANCISCO DIVISION		
11			
12	HASSEN LAARIF,	C 3:23-ev-05380 LJC	
13	Plaintiff,		
14	v.	STIPULATION TO STAY PROCEEDINGS; ORDER	
15	UNITED STATES OF AMERICA, et al.,	ONDER	
16	Defendants.		
17			
18	The parties, through their attorneys, hereby stipulate and respectfully request the Court to stay		
19	proceedings in this case for a limited time, until July 22, 2024. The parties make this joint request		
20			
21	unnecessary.		
22	Plaintiff filed this mandamus action seeking adjudication of their Form I-589, Application for		
23	Asylum and Withholding of Removal. United States Citizenship and Immigration Services ("USCIS")		
24			
25			
26	adjudication of the I-589 application, absent the need for further adjudicative action or unforeseen		
27	circumstances that would require additional time for adjudication.		
28	Accordingly, the parties stipulate and req	uest that the proceedings in this case be stayed until	
	Stip to Stay Proceedings C 3:23-cy-05380 LJC	1	

1	July 22, 2024, at which time the parties will file a joint status report with the Court. At that time, the	
2	parties may request a further continuance of the stay of proceedings, dismissal of the litigation if	
3	appropriate, or placement of the case back on the Court's active docket. A stay of proceedings in this	
4	case will benefit the parties and conserve the Court's resources while the parties pursue a potential	
5	administrative resolution.	
6	Dated: May 24, 2024 Respectfully submitted ¹ ,	
7	ISMAIL J. RAMSEY	
8	United States Attorney	
9	/s/ Elizabeth D. Kurlan ELIZABETH D. KURLAN Assistant United States Attorney	
11	Attorneys for Defendants	
12	Dated: May 24, 2024	
13	/s/ Ghassan Shamieh GHASSAN SHAMIEH	
14	Shamieh, Shamieh, & Ternieden Attorney for Plaintiff	
15		
16		
17	ORDER	
18	Pursuant to stipulation, IT IS SO ORDERED.	
19		
20	Date: June 6, 2024	
21	HON. ZISA . CISNEROS	
22	Unlited States Magistrate Judge	
23		
24		
25		
26		
27	¹ In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all signatories listed herein concur in the filing of this document.	
28	Stin to Story Proposedings	

2

Stip to Stay Proceedings C 3:23-cv-05380 LJC